

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Mail Processing Network
Rationalization Service Changes, 2012

Docket No. N2012-1

**SUPPLEMENTAL INFORMATION ON NATIONAL NEWSPAPER ASSOCIATION'S
MOTION TO COMPEL RESPONSE TO INTERROGATORIES AND TO PRODUCE A
WITNESS
(March 15, 2012)**

On March 14, 2012, National Newspaper Association filed a motion to compel responses from the Postal Service to NNA/USPS T1-12 and T1-13. NNA asked the Postal Service to confirm its filing of a report on Within County service measurement.

Since the filing of the motion, NNA has been made aware that a report entitled "Community Newspaper Study Highlights" was filed in Docket No. RM 2010-11.

Although the report was filed with the Commission and is on the public record, it likely is also still in the Postal Service's possession. Whether its conclusions and its relevance to measuring Within County service in today's changing environment have been factors in its development of the proposal on new service standards is not known. NNA continues to need information solely in the Postal Service's possession to answer questions on how USPS views community newspaper service under new proposed standards, particularly in light of the study. NNA also seeks an understanding of how the use of the Periodicals class data as a proxy for Within-County may be relied upon in the changing network environment. Thus, NNA renews its request for responses to the interrogatories and for a sponsoring witness who can discuss the measurement of Within County delivery.

Respectfully submitted,

Tonda F. Rush
KING & BALLOW
PO Box 50301
Arlington, VA 22205

March 15, 2012